

**STATE OF CALIFORNIA
BUSINESS, CONSUMER SERVICES AND HOUSING AGENCY
DEPARTMENT OF BUSINESS OVERSIGHT**

TO: JCS Enterprises, Inc., doing business as JCS Enterprises Services, Inc.
15132 Park of Commerce Blvd., Suite 102
Jupiter, FL 33478

T.B.T.I., Inc.
23286 Lago Mar Cir.
Boca Raton, 33433
and
7725 NW 39th Ave.
Coconut Creek, FL 33073

John Burke Marshall
50855 Washington Street, C169
La Quinta, CA 92253

DESIST AND REFRAIN ORDER

(For violations of sections 25110 and 25401 of the Corporations Code)

The California Commissioner of Business Oversight finds that:

1. At all relevant times, JCS Enterprises, Inc., doing business as JCS Enterprises Services, Inc. ("JCS"), was a Delaware corporation with its last known address at 15132 Park of Commerce Blvd., Suite 102, Jupiter, FL 33478.

2. At all relevant times, T.B.T.I., Inc. ("TBTI") was a Florida corporation with its last known addresses at 23286 Lago Mar Cir., Boca Raton, 33433, and 7725 NW 39th Ave., Coconut Creek, FL 33073.

3. At all relevant times, John Burke Marshall ("Marshall") was a licensed California insurance agent with a business address of 50855 Washington Street, C169, La Quinta, CA 92253.

4. At all relevant times, TBTI served as a sales agent of JCS. JCS and TBTI utilized Marshall as a sales representative in California.

5. Beginning at least as early as 2013, Marshall, on behalf of JCS and TBTI, offered or sold securities, in the form of Virtual Concierge Investor Contracts – investment contracts, in

1 California.

2 6. The purported purpose of the securities offering was to raise funds from investors,
3 some of whom were Marshall's insurance clients, in order to purchase Virtual Concierge Machines
4 ("VCMS"), stand-alone machines with a monitor display that allow users to purchase products and
5 print retail coupons, among other things. JCS was to locate, place, and manage the VCMS to
6 generate the purported revenues to pay investors their returns. Investors did not have to do anything
7 to earn their money. VCMS were purportedly to be placed at various locations (e.g. hotels, airports,
8 stadiums) to enable businesses to advertise their products and services via touch screen and printable
9 tickets or coupons.

10 7. Marshall advised some of his insurance clients to consider liquidating their insurance
11 annuities, and purchasing the above described securities.

12 8. These securities were offered or sold in this state in issuer transactions. The
13 Department of Business Oversight has not issued a permit or other form of qualification authorizing
14 any person to offer or sell the above described securities, in this state.

15 9. In connection with the offer or sale of these securities, Marshall, on behalf of JCS and
16 TBTI, made the following untrue statements of material facts:

17 a. Investors were guaranteed monthly returns of approximately \$300.00 for the life of a
18 three-year or four-year investment contract. Some investors received monthly payments for only a
19 few months.

20 b. Marshall told investors that he did his due diligence, and the above described
21 investment program was a "slam dunk" investment, and low-risk opportunity.

22 Based on the foregoing findings, the California Commissioner of Business Oversight is of the
23 opinion that the investment contracts offered or sold by JCS Enterprises, Inc., doing business as JCS
24 Enterprises Services, Inc., T.B.T.I., Inc., and John Burke Marshall are securities subject to
25 qualification under the Corporate Securities Law of 1968 and are being or have been offered or sold
26 without first being qualified in violation of Corporations Code section 25110.

27 Pursuant to Corporations Code section 25532, JCS Enterprises, Inc., doing business as JCS
28 Enterprises Services, Inc., T.B.T.I., Inc., and John Burke Marshall are ordered to desist and refrain

1 from the further offer and sale of securities in California, including but not limited to investment
2 contracts, unless and until qualification has been made under the Corporate Securities Law of 1968,
3 or unless exempt.

4 Further, the California Commissioner of Business Oversight is of the opinion that JCS
5 Enterprises, Inc., doing business as JCS Enterprises Services, Inc., T.B.T.I., Inc., and John Burke
6 Marshall offered or sold securities in this state by means of written or oral communications which
7 included untrue statements of material facts or omitted to state a material fact necessary in order to
8 make the statements made, in the light of the circumstances under which they were made, not
9 misleading, in violation of Corporations Code section 25401.

10 Pursuant to Corporations Code section 25532, JCS Enterprises, Inc., doing business as JCS
11 Enterprises Services, Inc., T.B.T.I., Inc., and John Burke Marshall are hereby ordered to desist and
12 refrain from offering or selling or buying or offering to buy any security in the State of California,
13 including but not limited to investment contracts, by means of any written or oral communication
14 which includes an untrue statement of a material fact or omits to state a material fact necessary in
15 order to make the statements made, in the light of the circumstances under which they were made, not
16 misleading.

17 Pursuant to Corporations Code section 25403, subdivision (b), any person that knowingly
18 provides substantial assistance to another person in violation of any provision of this division or any
19 rule or order thereunder shall be deemed to be in violation of that provision, rule, or order to the same
20 extent as the person to whom the assistance was provided.

21 This Order is necessary, in the public interest, for the protection of investors and consistent
22 with the purposes, policies and provisions of the Corporate Securities Law of 1968.

23 Dated: February 11, 2016
24 Sacramento, California

JAN LYNN OWEN
Commissioner of Business Oversight

25
26 By _____
27 MARY ANN SMITH
28 Deputy Commissioner
Enforcement Division